

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

MAGGIE RUSSELL,

Case No. 1:22-cv-00086-TBM-RPM

Plaintiff,

v.

MISSISSIPPI GULF COAST
COMMUNITY COLLEGE through its
Board of Trustees, et al.,

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

NOW COMES Plaintiff MAGGIE RUSSELL, by and through her attorney, with this Unopposed Motion for Extension of Time to Respond to Defendant's Motion for Summary Judgment and hereby states the following:

1. Defendants filed their Motion for Summary Judgment on April 24, 2023 (ECF 31, 32).
2. Plaintiff's Response to Defendant's Motion for Summary Judgment is currently due on May 8, 2023.
3. Plaintiff's attorney is legally blind. While accommodations are in place, it takes Mr. Altman considerably longer to read, write and prepare documents.
4. Plaintiff respectfully requests an additional 14-day extension of time to file their Response to Defendant's Motion for Summary Judgment, making the Response due on or before May 22, 2023.

5. Plaintiff has conferred with the Defendant on the present Motion.

Defendant has advised that they will not oppose the Motion.

6. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion. Neither Plaintiff nor Defendant is requesting a continuance of the trial date.

7. Due to the nature of this motion, Plaintiff requests that the necessity for a separate memorandum of authorities be waived.

WHEREFORE, the Plaintiff, by and through their undersigned counsel, respectfully requests that the Court grant this Unopposed Motion for Extension of Time.

Respectfully submitted, this the 27th day of April 2023.

By: /s/ Keith Altman
Keith Altman, Esq.
Attorney for Plaintiff

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Keith Altman, do hereby certify that I electronically filed the foregoing document with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record as listed in the Service List in effect on the date of electronic filing.

SO CERTIFIED, this 27th day of April, 2023.

/s/ *Keith Altman*
Keith Altman, Esq.